

November 13, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: National Lifeline Association and Q Link Wireless LLC Joint Written Ex Parte Presentation,
WC Docket Nos. 17-287, 11-42, 09-197 and 10-90

Dear Ms. Dortch:

We, the undersigned organizations, submit this letter to further encourage the Federal Communications Commission (“FCC”) to direct the Wireline Competition Bureau to grant the pending Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study filed by CTIA, the National Consumer Law Center, National Hispanic Media Coalition, OCA –The Asian Pacific American Advocates, and United Church of Christ, OC, Inc.¹ The proposal was carefully crafted and negotiated among public interest advocates and industry representatives.

This issue is paramount to the viability of the Lifeline program as changes to the minimum standards scheduled for December 1, 2019 quickly approach. We reiterate the critical and devastating nature of the projected effects the scheduled changes will have on Americans who rely on Lifeline for everyday communication.

We collectively continue to be concerned with any decrease in voice-only services or in voice-only subsidy support. Consumers who rely on voice-only Lifeline service are often those who are the most vulnerable and who are in the most need of assistance provided by the program. We reject any proposal that reduces the level of voice-only support without a proper survey of the marketplace.

We note that a recent flurry of new proposed changes to the minimum standards, while presumably submitted in good faith, cannot accurately predict the outcome those changes will have on real-life Lifeline subscribers--only a factual, research-based marketplace study can accurately do so. Specifically, new proposed changes that increase minimum standards data allotment to 3GB do not serve the long term sustainability of the Lifeline program if this is a standard that cannot be met or sustained by a majority of Lifeline ETCs and is certainly not grounded in any public basis of fact or marketplace analysis. Thus, we again urge the

¹ See Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (Joint Petition to Pause Implementation).

Commission to conduct a marketplace study as originally proposed to accurately, factually and reliably identify the needs of the Lifeline market and adjust the program's minimum standards accordingly. We urge the Commission to spend the amount of time and care such a study requires and thus do not support shortening the time allocated to the study because we are concerned it will impair the thoroughness of the analysis.

Moreover, these new minimum standards proposals do not take public interest or civil rights concerns into account. In fact, public interest groups undersigned here were not consulted or alerted on the formulation of new proposed changes to the Lifeline minimum standards. In particular, public interest and civil rights groups included here were strong advocates to pause the minimum standards as they stand now--including support for voice services--before the scheduled changes go into effect to ensure that not a single American who relies on Lifeline will lose their subscription because of a subsidy reduction or passed-on cost.

The competitive juxtaposition of the various versions of newly proposed changes submitted by corporate stakeholders underscores our argument. The Commission has a statutory duty to conduct the Lifeline program, the Universal Service Fund, and this country's communications systems in such a way that promotes and benefits the public interest. It appears low-income Lifeline customers--families, working individuals, people with disabilities and more have been overlooked in this process. Despite broad support for the original, carefully negotiated proposal, the new minimum standards proposals give rise to the inference that the Commission is not inclined to grant the original petition.² In this case, the Commission should adopt a proposal that is not likely to pass on increased costs to consumers and offers them maximum choice.

Respectfully Submitted,

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² See National Association of Lifeline and Q Link Wireless, LLC, *Ex Parte* Letter, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Nov. 6, 2019); CTIA *Ex Parte* Letter, WC Docket Nos. 11-42, 09-197, 10-90 (filed Nov. 5, 2019).